

United States of America
plaintiff

vs.

Salomon Baca
defendant

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

APR 26 2013

MATTHEW J. DYKMAN
CLERK

case#: 1:12-CR-00445-JB
Judge: Alan B Johnson
James O Browning

Motion Requesting 3rd party Release
or Halfway House.

Come's now the defendant Salomon Baca, pro se and Respectfully moves this court to issue an order granting 3rd party release to Lydia O Baca, defendant's mother. Or Halfway House to La Pasada, As grounds for this motion defendant States the following.

On February 14 2013, defendant was sentenced to 64 months in the BOP. The defendant is currently finishing off a State Sentence of 63 months in the DOC, NEMDF Clayton N.M. That will be completed on April 28th 2013. Defendant will not however be released from DOC custody on April 28th 2013 because defendant was in Federal Holding. Fighting Federal charge (That incidently is the reason for the State case as well as the federal case) when his Parole Plan would/should have been Submitted, but was not because defendant was in the physical custody of the federal Govt. Defendant may be in DOC custody for up to 1 month past his release date, of April 28th 2013. Initial release date figures had defendants release date at Nov 28th 2013, but after an Internal Audit were found wrong and adjusted to April 28th 2013.

Defendant further States that:

In 1995 defendant turned himself in to serve a 364 day sentence in the DOC.

After defendant was granted a 3 week postponement of sentence to spend time with his wife/son/mother and to attend to personal matters, Defendant also turned himself in on Aug of 2000 to serve a 19 month sentence in the B.O.P. After he was granted Halfway House and 3rd Party release. Defendant also turned himself into State Probation and Parole on the current charge on Dec 15-2009 and has been in State custody ever since. Defendant was also at the Level I (The Farm.) in Los Lunas N.M. (Before he was indicted by the Federal Gov't) for 8 months.

Defendant also states that:

He was attacked while in Santa Fe Federal Holding for refusing to allow 4 other inmates to use his mailing privileges to bring Drugs into the Holding Facility. Defendant had a finger severed, had to have his head stapled shut, was blinded and left blind in both eyes, has just recently gotten the vision back in his left eye only, has developed a twitch in his head and mouth, And has intense pain in the head and back of the neck area, Along with a Stuttering when speaking.

Defendant would use the privilege of 3rd party release or Halfway House to attend to Medical Issues, As medical treatment in both State and Federal custody is grossly inadequate, As well as to spend time with mother / son and take care of personal business.

Respectfully Submitted
Salomon Baca.

Due ^{to} hardships and atypical suffering caused by unforeseen circumstances. Respectfully asks the Court to grant 3rd party release and be allowed a 30 day grace period before turning himself in to finish Federal Sentence.

Relief: Respectfully ask Said Motion to be granted and or
Instruction provided as the court deems just and proper.

Sign Solomon Becca

On Date 4/23/13 I Certify that I mailed a
True Copy of Said Motion to:

1 U.S. District Court Clerk 333 Lomas Blvd N.W.
Albuquerque, N.M.
87102

2. District Attorney Louis E Valencia
201 Third Street N.W. Suite 900
Albuquerque, N.M.
87102

Defendant use was Prepaid First class Postage

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Sign Solomon Becca

Salomon Baca 2-E-101
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At Albuquerque NM

APR 26 2013



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Albuquerque, NM
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